

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

CASE NAME: Stephen J. Ratcliffe v. BRP US Inc.

DOCKET NO: 1:20-cv-00234-JAW

Court Exhibit List

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
	1	The Can Am Maverick X3 Turbo, VIN: 3JBVGAY40KK002165					
	2	An exemplar Can Am Maverick X3 Turbo					
	3	ESi photographs of the Can Am Maverick X3 Turbo in question (3-16, 3-53, 3-67, 3-68, 3-71, 3-73, 3-90) (Demonstrative)			11/20/24		
	3-120	Photograph of Can Am Maverick X3			11/13/24	11/13/24	11/13/24
	4	ESi photographs of the exemplar vehicle					
	5	A model of the Can Am Maverick X3 Turbo					
	6	The Operator's Guide for the 2019 Can Am Maverick X3 Turbo			11/13/24	11/13/24	11/13/24
	7	Images of the on-product decals provided with the Can Am Maverick X3 Turbo					
	7-7	Images of the on-product decals provided with the Can Am Maverick X3			11/13/24	11/13/24	11/13/24
	7-10	Images of the on-product decals provided with the Can Am Maverick X3			11/13/24	11/13/24	11/13/24
	7-16	Images of the on-product decals provided with the Can Am Maverick X3			11/13/24	11/13/24	11/13/24
	8	The hang tag provided with the 2019 Can Am Maverick X3 Turbo					
	9	Can Am side-by-side pre-delivery checklist (PDI)			11/21/24	11/21/24	11/21/24
	10	The safety video provided with the 2019 Can Am Maverick X3 Turbo (Still Photos 10-1, 10-2, 10-3, 10-4, 10-5) Demonstrative			11/19/24	11/19/24	11/19/24
	10	Still Photos 10-1, 10-2, 10-3, 10-4, 10-5 (Demonstrative)			11/19/24		
	11	ESi photographs of the accident scene					
	12	Scanned data from joint inspection of the Can Am Maverick X3 Turbo					

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	13	Aerial videos of the accident scene and other ride areas in the Gogan pits					
	14	State of Maine Crash Report					
	15	Maine Warden Service Incident Report with photos					
	16	Houlton Police Department Report					
	17	2015 tax return of Stephen Ratcliffe					
	18	2016 tax return of Stephen Ratcliffe					
	19	2017 tax return of Stephen Ratcliffe					
	20	ESi photographs of the accident scene					
	21	2018 tax return of Stephen Ratcliffe					
	22	2019 tax return of Stephen Ratcliffe					
	23	2020 tax return of Stephen Ratcliffe (Reserved-Not produced by Plaintiff)					
	24	2021 tax return of Stephen Ratcliffe (Reserved-Not produced by Plaintiff)					
	25	2022 tax return of Stephen Ratcliffe (Reserved-Not produced by Plaintiff)					
	26	2023 tax return of Stephen Ratcliffe (Reserved-Not produced by Plaintiff)					
	27	Dealer Invoice for the Subject Vehicle					
	28	Tidd's Bill of Sale					
	29	Photographic images of BRP test facilities					
	30	Photographic images of a Yamaha YXZ recreational off-highway vehicle					
	30-1	Yamaha YXZ 1000 (demonstrative)		x	11/20/24		
	31	Photographic images of a Yamaha Wolverine recreational off-highway vehicle					
	32	Photographic images of an Artic Cat Wildcat recreational off-highway vehicle (demonstrative)		x	11/12/24		

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	33	Photographic images of a Kawasaki Teryx recreational off-highway vehicle (demonstrative)			11/13/24		
	34	Photographic images of a Hisun Sector recreational off-highway vehicle					
	35	Photographic images of a Hisun Strike recreational off-highway vehicle (demonstrative)		x	11/20/24		
	36	Photographic images of a Polaris RZR Turbo recreational off-highway vehicle					
	37	Photographic images of a Polaris RZR 1000 recreational off-highway vehicle					
	38	Photographic images of a Polaris RZR XP recreational off-highway vehicle					
	39	Photographs depicting ROPS designs utilized with the Polaris RZR (demonstrative)		x	11/12/24		
	40	Photographs depicting ROPS designs utilized with the Polaris Ranger (demonstrative)			11/12/24		
	41	Photographs depicting ROPS designs utilized with the Arctic Cat Wildcat					
	42	Photographs depicting ROPS designs utilized with the Kawasaki Teryx					
	42-2	Kawasaki Teryx (demonstrative)		x	11/20/24		
	43	Photographs depicting ROPS designs utilized with the Kawasaki Mule					
	44	Slides/Photographs/Video illustrating operational issues with the use of wrist restraints					
	45	ANSI-ROHVA 2016 Standards					
	46	ANSI-ROHVA 2023 Standards					
	47	2020 CPSC public comments on the ANSI-ROHVA-2016 Standards					
	48	Photographic images of a Honda Talon recreational off-highway vehicle					
	49	Surrogate photographs comparing the Honda Talon to the Maverick X3 Turbo (49-03, 49-18, 49-09, 49-13, 49-23, 49-25) (demonstrative)			11/20/24		
	50	ORS Construction Method Evaluation photographs of the Honda Talon (demonstrative)			11/12/24		
	51	Images of open-cab vehicular design concepts					
	52	Photographs/images of the Can Am Spyder (for demonstrative purposes only)					

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	53	Photographs/images of the BRP electric dual-purpose motorcycle (for demonstrative purposes only)					
	54	Photographs/images of the SeaDoo Speedster (for demonstrative purposes only)					
	55	Photographs/images of the SkiDoo Elite (for demonstrative purposes only)					
	56	Photographs/images of the SeaDoo 3D (for demonstrative purposes only)					
	57	SAE 2005-01-0941, Evaluation of Human Surrogate Models for Rollover					
	58	SAE 2100-01-1117, Rollover Testing of ROV for Accident Reconstruction					
	59	SAE 890732, Perception/Reaction Time Values for Accident Reconstruction					
	60	SAE J2258, Light Duty Vehicles					
	61	ANSI/OPEI B79.1-2016, Multi-Purpose Off Highway Utility Vehicles					
	62	NHTSA/FMVSS 500, Low Speed Vehicles					
	63	ANSI/NGCMA Z130, Golf Cars					
	64	Bridgestone Firestone Tire Maintenance and Safety Manual					
	65	Images- NHTSA Approved Low Speed Vehicles					
	66	ESI Accident Scene photographs (66, 66-002, 66-0056) (Demonstrative)			11/20/24		
	67	Stiller Can-Am X3 Video (Demonstrative)			11/20/24		
	68	ESI Case Analysis File 68-026 (Demonstrative)			11/20/24		
	69	Aerial Photographs of the Accident Scene (69-029, 69-043, 69-044) (Demonstrative)			11/20/24		
	70	Scanned Images from Faro Scan of the Maverick X3 in Question					
	71	Scanned Images from Faro Scan of the Accident Scene					
	72	ESI Data generated from exemplar steer data					
	73	ESI Data generated from exemplar testing of the Maverick X3 Turbo					

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	74	ESI Videos of Exemplar Riding Evaluations (demonstrative)		x	11/20/24		
	75	ESI Photographs of Exemplar Riding Evaluations at the Accident Scene					
	76	ESI Photographs taken during ESI/Exponent Joint Surrogate Evaluation 76-24, 76-27, 76-71, 76-74, 76-79 (Demonstrative)			11/20/24		
	77	ESI Photographs of Exemplar Maverick X3					
	77-029	Photo of X3 Vehicle (Demonstrative)			11/12/24		
	77-17	Photo of Can-Am Maverick		x	11/20/24	11/20/24	11/20/24
	78	ESI Photographs, Data and Results of Tilt Table Testing of the Maverick X3 (78-1 and 7-88) (Demonstrative)			11/20/24		
	79	ESI Photographs of Honda Pioneer Evaluation					
	80	ESI Photographs and Video from Maverick X3 Ride and Handling Evaluations (Videos are separate exhibit at Ex 408)					
	81	ESI Photographs of Honda Talon Evaluation					
	82	ESI Notes of Exemplar Ride and Handling Evaluations of the Maverick X3					
	83	ESI Notes of Tilt Table Evaluation of the Maverick X3					
	84	ESI Notes of Joint ESI/Exponent Surrogate Evaluation					
	85	BUDS Data from the Subject Vehicle					
	86	Exponent Diagrams, Charts, and Mapping of the physical injuries (Withdrawn, replaced by Ex. 423)					
	87	Exponent Crash Evaluation Charts mapping the physical damage to vehicle (Withdrawn, replaced by Ex. 424-425)					
	88	Exponent Photographs from the Joint ESI/Exponent Surrogate evaluation (Withdrawn, replaced by Ex. 427)					
	89	Exponent Diagrams, Illustrations of the Maverick X3 (Withdrawn, replaced by Ex. 426)					
	90	Exponent Diagrams, Illustrations, Modeling of the rollover sequence (Withdrawn, replaced by Ex. 428-429)					
	91	SAE 2012-01-0096, Biomechanics of Occupant Responses During recreational off-highway vehicle riding and 90-degree tip-overs					
	92	Exponent Diagrams, Illustrations,					

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
		Modeling of Occupant Kinematics in response to lateral accelerations (Withdrawn, replaced by Ex. 430-432)					
93		Exponent Videos demonstrating occupant response to tip-overs and lateral acceleration forces (Withdrawn, replaced by Ex. 433 and 439)					
94		SAE 2005-01-0302, Electromyographic Activity and posturing of the human neck during rollover tests					
95		R&TD Project, Improvement of Rollover Safety for Passenger Vehicles					
96		Exponent Photographs, Videos, Illustrations of counter-posturing (Withdrawn, replaced by Ex. 434)					
97		Exponent Demonstratives illustrating counter-posturing in response to lateral accelerations (Withdrawn, replaced by Ex. 430-432)					
98		Exponent Slides, Videos, Photographs, Illustrations from Joint ESI/Exponent Surrogate study (Withdrawn, replaced by Ex. 427)					
99		Videos and stills of occupant kinematics at 1G (Withdrawn, replaced by Ex. 433)					
100		Exponent Illustrations of the injury mechanism (Withdrawn, replaced by Ex. 430)					
101		Diagram of extensor compartment Annotation Saved (demonstrative)			11/13/24		
102		Exponent Photographs illustrating limits of netting as an injury prevention tool (Withdrawn, replaced by Ex. 441)					
103		American National Standard for Product Safety Signs and Labels ANSI Z535.4-2011 (R2017)					
104		Warranty Registration					
105		Post-Accident Photographs Produced by Plaintiff (5 photos)					
106		Photo of Stephen Ratcliffe in subject vehicle at Dealership (taken by Nathan Leahy) (produced by plaintiff)					
107		Social media Post Photo "No wayyy" (produced by plaintiff)					
108		Photo of subject vehicle on trailer (produced by plaintiff)					
109		Video of subject vehicle on trailer "I was the first to drive it, lol"					
110		Go Pro Videos (5 videos) (produced by plaintiff)					
110A		Go Pro Video			11/19/24	11/19/24	11/19/24
110A-1		Still photo with Steven as passenger (demonstrative)			11/22/24		

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	110-5	Still Photo from Video (demonstrative)			11/19/24		
	110B	Go Pro Video			11/19/24	11/19/24	11/19/24
	110D	Go Pro Video			11/19/24	11/19/24	11/19/24
	111	MVI Videos (31 videos) (produced by plaintiff)					
	111H	Go Pro Video Segment at Tidd's			11/19/24	11/19/24	11/19/24
	112	Compilation Video (Christian Ratcliffe Deposition Exhibit)					
	113	Medical Records of Houlton Ambulance Service					
	114	Medical Records of Houlton Regional Hospital			11/13/24	11/13/24	11/13/24
	115	Medical Records of Lifeflight of Maine					
	116	Medical Records of Maine Medical Center			11/13/24	11/13/24	11/13/24
	117	Medical Records of Christopher Judson, M.D. of Orthopedic Associates of Hartford					
	118	Medical Records of Hanger Clinic					
	119	Medical Records of Medical Center Orthotics & Prosthetics					
	120	Medical Records of Subramani Seethrama, M.D.					
	121	Medical Records of Brandy R. Stepney, APRN					
	122	Radiology films of Orthopedic Associates of Hartford, dated 8/21/2019					
	123	Radiology films of Maine Health, US Anesthesia Nerve Block, dated 7/31/2019					
	124	Radiology films of Maine Health, CT Angiogram Upper Extremity, dated 7/31/2019					
	125	Radiology films of Maine Health, CT Angiogram Chest ABD Pelvis, dated 7/31/2019					
	126	Radiology films of Maine Health, CT Head and Cervical Spine WO Contrast, dated 7/31/2019					
	127	Radiology films of Houlton Regional Hospital, Forearm, dated 7/30/2019					
	128	Radiology films of Houlton Regional Hospital, Chest, dated 7/30/2019					

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	129	Photos of Plaintiff, Post accident with family					
	130	Certificate of Origin for Subject Vehicle					
	131	Packing Labels for Subject Vehicle					
	132	Delivery Invoice for Subject Vehicle					
	133	Can Am 2019 Operator's Guide Maverick X3 Series					
	134	Can Am Side-By-Side Pre-Delivery Check List (PDI)					
	135	2017 Shop Manual – Maverick X3 Series					
	136	2018 Shop Manual – Maverick X3 Series					
	137	2019 Shop Manual Supplement – Maverick Series					
	138	BRP Test report Title: Revue securitaire; Annee Modele: 2011; Produit: Can-Am; Nom Du Project: Transportation Side by Side (16 pp)					
	139	July 15, 2010 - Applied Safety and Ergonomics, Inc. (Steven Hall) Summary Report To Karl Richard, Product Safety Engineer, BRP re: Can-Am Commander Project Work performed to assist BRP with developing product safety info for new Can-Am Commander					
	140	Sales – Maverick X3 Turbo (MY2017 – MY2020 (US only) (2016 – 2020)					
	141	Maverick X3 Sales data (MY2017 – MY2024) (Reserved)					
	142	Accessory Sales data, Part no. 715004694					
	143	1 – US Wholesale data since launch chart					
	144	Enhanced Warranty - Example of "B.E.S.T. – Bombardier Extended Service Terms"					
	145	Line Inspection Plan dated 12/10/20 – Vehicle No. SSVMAV TURBO W 19 0009DKA00 – Inspection Batch 890000668788; Location L01 (26 pp)					
	146	Line Inspection Plan dated 12/10/20 – Vehicle No. SSVMAV TURBO W 19 0009DKA00 – Inspection Batch 890000668788; Location L01A (15 pp)					

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	147	Line Inspection Plan dated 12/10/20 – Vehicle No. SSVMAV TURBO W 19 0009DKA00 – Inspection Batch 890000668788 – Location L02 (4 pp)					
	148	Line Inspection Plan dated 12/10/20 – Vehicle No. SSVMAV TURBO W 19 0009DKA00 – Inspection Batch 890000668788 – Location L02A (13 p)					
	149	Line Inspection Plan dated 12/10/20 – Vehicle No. SSVMAV TURBO W 19 0009DKA00 – Inspection Batch 890000668788 – Location P01 (1 p)					
	150	Line Inspection Plan dated 12/10/20 – Vehicle No. SSVMAV TURBO W 19 0009DKA00 – Inspection Batch 890000668788 – Location P01A (1 p)					
	151	Final Inspection Plan dated 12/10/20 – Vehicle No. SSVMAV TURBO W 19 0009DKA00 – Inspection Batch 890000668788 – Location L02 (1 p)					
	152	Final Inspection Plan dated 12/10/20 – Vehicle No. SSVMAV TURBO W 19 0009DKA00 – Inspection Batch 890000668788 – Location L02A (1 p)					
	153	Final Inspection Plan dated 12/10/20 – Vehicle No. SSVMAV TURBO W 19 0009DKA00 – Inspection Batch 890000668788 – Location P01 (4 pp)					
	154	Daily Inspection Plan dated 12/10/20 – Vehicle No. SSVMAV TURBO W 19 0009DKA00 – Inspection Batch 890000668788 – Location L01 (8 pp)					
	155	Daily Inspection Plan dated 12/10/20 – Vehicle No. SSVMAV TURBO W 19 0009DKA00 – Inspection Batch 890000668788 – Location L01A (4 pp)					
	156	Daily Inspection Plan dated 12/10/20 – Vehicle No. SSVMAV TURBO W 19 0009DKA00 – Inspection Batch 890000668788 – Location L02 (1 p)					
	157	Daily Inspection Plan dated 12/10/20 – Vehicle No. SSVMAV TURBO W 19 0009DKA00 – Inspection Batch 890000668788 – Location L02a (8 pp)					
	158	Daily Inspection Plan dated 12/10/20 – Vehicle No. SSVMAV TURBO W 19 0009DKA00 – Inspection Batch 890000668788 – Location P01 (1 p)					
	159	List of Verification Operations - Vehicle No. SSV MAV TURBO W 19 0009DKA00 – Inspection Batch 890000668788 – Location L01A (1 p)					
	160	Check-point data; Block L01 – Inspection Batch: 890000668788; Model SSV MAV TURBO W 19 – 00009DKA00 (2 pp)					
	161	Check-point data; Block L01A – Inspection Batch: 890000668788; Model SSV MAV TURBO W 19 – 00009DKA00 (2 pp)					
	162	Check-point data; Block L01B – Inspection Batch: 890000668788; Model SSV MAV TURBO W 19 – 00009DKA00 (2 pp)					

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	163	Check-point data; Block P02 – Inspection Batch: 890000668788; Model SSV MAV TURBO W 19 – 00009DKA00 (1 p)					
	164	Check-point data; Block P02A – Inspection Batch: 890000668788; Model SSV MAV TURBO W 19 – 00009DKA00 (1 p)					
	165	Dynamic Stability Test (TC-16-0135)					
	166	ANSI/ROHVA 1-2014/2016 Compliance Testing by DRE (10/24/16) Tilt-Table Test (TC-16-0136)					
	167	Vehicle Handling Test (TC-16-0171) 8/30/16 (ANSI/ROHVA 1-2016)					
	168	Tests Reports including duty cycles and incident reports during physical tests (performed in Valcourt, Quebec and Palm Bay, FL)					
	169	Test report: ROHVA Certification for Maverick X3					
	170	ROHVA Standard (CT-17-0020)					
	171	Arm & Hands Protection Test (ST-16-7389) Lab Results					
	172	Shoulder & Hip Protection Test (ST-16-7391) Lab Results					
	173	Seatbelt Test Results (ET-17-0215)					
	174	Seatbelt Test Results (ST-16-7182)					
	175	Seatbelt Test Results (ST-16-7183)					
	176	Safety Review for the Maverick X3 Turbo Project model year 2017					
	177	Steering Control Test (ET-16-0164) ANSI/ROHVA 1-2016					
	178	ORS Test (ET-17-0179) ANSI/ROHVA 1-2016					
	179	Handhold Test (ET-17-0180) ANSI/ROHVA 1-2016					
	180	Speed Control Test (ET-017-0463) ANSI/ROHVA 1-2016					
	181	ORS Zone 4 Test (ET-17-0563) ANSI/ROHVA 1-2016					
	182	Overall dimensions test report (ET-18-0082)					
	183	Owner's Manual (ET-18-0084) ANSI/ROHVA 1-2016					

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	184	Tires Report (ET-18-0122)					
	185	Label and Tag Report (ET-18-0032)					
	186	Laboratory Test (ST-16-7212) Maximum Speed Capability & Brake Performance & Parking Brake Performance & Seat Belt Reminder					
	187	Laboratory Test (ST-16-7430) Maximum Speed Capability & Brake Performance & Parking Brake Performance					
	188	Cage Test (ST-17-8735)					
	189	ROV Definition Report (TC-17-0022) ANSI/ROHVA 1-2016					
	190	VIN Report (TC-18-0016)					
	191	ET-17-0563 (Zone 4 – head & neck - ORS) ANSI/ROHVA 1-2016					
	192	ST-16-7389 – Zone 3 ORS testing					
	193	ST-16-7391 – Zone 2 ORS testing					
	194	ST-16-7711 testing					
	195	ST-16-7709 Measure rigidity of mounting points					
	196	ST-16-7182 testing					
	197	ET-17-0179 testing ANSI/ROHVA 1-2016					
	198	CT-17-0020 testing ANSI/ROHVA 1-2016 - ORS					
	199	ST-17-8254 – Rear Door (Zone 3) conformity					
	200	ST-17-8222 testing					
	201	ST-16-7700 – Zone 1 (Leg/foot) testing					
	202	ST-16-7698 – Zone 2 testing					
	203	ST-16-7392 – Zone 1 (Leg/foot) testing					

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	204	ET-17-0564 – Zone 4 – ORS (Head/Neck) testing					
	205	ST-18-9386 testing					
	206	ST-17-8475 - Handhold testing					
	207	ET-19-0126 – Zone 4 ORS – Head/Neck testing ANSI/ROHVA 1-2016 – ORS – 3/13/19					
	208	ST-17-8512 testing					
	209	ET-17-0511 – Zone 4 ORS – Head/Neck testing ANSI/ROHVA 1-2016 – ORS – 9-6-17					
	210	ET-17-0509 testing ANSI/ROHVA 1-2016 – Seat Belt Reminder, speed limiter					
	211	ST-16-7710 testing					
	212	ET-16-0622 – Zone 4 ORS – Head/Neck ANSI/ROHVA 1-2016 – ORS					
	213	ET-16-0452 – Zone 4 testing					
	214	ET-16-0188 – ORS testing					
	215	TC-16-0138 – Certificate of Compliance					
	216	ST-17-8476 testing					
	217	ST-15-6451 – Seat Belt Reminder					
	218	ST-13-14622 – Speed Control					
	219	ET-19-0129 – Seat Belt Reminder and Speed Limiter ANSI/ROHVA 1-2016 – 3-15-19					
	220	TC-19-0039 – Statement of Conformance					
	221	ST-19-0505 testing					
	222	ST-18-9614 testing					
	223	ST-18-9203 testing					
	224	ST-16-7132 – Zone 3 testing					
	225	ST-16-7086 testing					

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	226	ST-16-7046 testing					
	227	ST-15-6858 testing					
	228	ST-15-6348 testing					
	229	ANSI/ROHVA 1-2011 ROPS testing					
	230	ST-15-6642 testing					
	231	ST-15-6613 testing					
	232	ST-15-6488 – Zone 4 - ORS testing					
	233	ST-15-6450 testing					
	234	ST-15-6392 testing					
	235	ST-15-6349 testing					
	236	ST-15-6344 testing					
	237	ST-15-6205 testing					
	238	ET-19-0243 – Seat Belts testing					
	239	ET-16-0045 testing ANSI/ROHVA 1-2014 ORS Maverick X3 Max					
	240	ET-16-0285 testing ANSI/ROHVA 1-2014 ORS Zone 4					
	241	ET-16-0284 testing					
	242	TC-16-0070 testing					
	243	TC-16-0063 testing ANSI/ROHVA 1-2014 ORS Zone 4					
	244	TC-16-0046 testing ANSI/ROHVA 1-2014 ORS Zone 3					
	245	TC-15-0049 testing					
	246	TC-15-0021 testing ANSI/ROHVA 1-2011 ORS Zone 3					
	247	TC-13-0003 testing					

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	248	TC-13-0003 testing					
	249	TC-13-0001 testing					
	250	Amsafe Test Specification Comparison					
	251	ST-16-7212 testing Maximum Speed Capability					
	252	ST-15-6363 – Maverick ORS testing					
	253	ST-14-5944 testing					
	254	ST-13-4641 testing Maverick & Commander					
	255	ST-13-4621 – Seat Belt testing					
	256	ST-13-4397 testing					
	257	ST-13-4392 – Side Netting testing					
	258	ST-13-4358 testing					
	259	ST-12-4311 testing					
	260	ET-17-2015 – Seat Belts testing					
	261	ST-15-6474 testing					
	262	New Product Development (NPD)					
	263	Title: Safety Review; Model: 2018; Product: Can-Am SSV					
	264	Title: Safety Review; Model: 2019; Product: Can-Am SSV					
	265	Maverick X3 2019 Accessories, Riding Gera & Genuine Parts Catalog					
	266	Test Report: Test de renversement du SHIFT avec mannequin					
	267	(715004694 FRONT WINDOWS NET) Photos (P1)					
	268	(715004694 Nascar Style Net) 280000799_800 Tech Pack Front Window Nets_OD					
	269	(715004694 Nascar Style Net) 0 components info nascar door filler (P3)					

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	270	(715004694 Nascar Style Net) SG_Inspection Report_Front Window Net 280000799_800 (P3)					
	271	(715004694 Nascar Style Net) SG_Inspection Report _Nascar Net (P1)					
	272	(715006494 Nascar Style Net) SG_Inspection Reort_Nascar Net (P1.5)					
	273	(715004694 Nascar Style Net) TEXTILE TESTS BOARD_Nascar Door Filler					
	274	(715004694 Nascar Style Net) UV test and saline bath for the o-ring of NASCAR net					
	275	(P1) (715004694 FRONT WINDOWS NET) Photos_installed					
	276	(P1.5) (715004694 FRONT WINDOWS NET) Kit Photos					
	277	(P1.5) (715004694 FRONT WINDOWS NET) Photos_installed					
	278	(P3) (715004694 FRONT WINDOWS NET) Photos_installed					
	279	(Physical testing) 109548 (Door Net- Nascar style, #715004694) Model: 2018 X3 Xmr					
	280	(PO 2017-04-10) (715004694 FRONT WINDOWS NET) Photos					
	281	(PO 2017-05-31) (715004694 FRONT WINDOWS NET) Photos					
	282	(PO 2017-06-21) (715004694 FRONT WINDOWS NET) Photos					
	283	Drawing: Part #707900686					
	284	Drawing: Part #715006261_8967063_169					
	285	Drawing: Part #715006262_8963445_169					
	286	Drawing: Part #715008059_8508701_169					
	287	Drawing: Part #715008063_9841007_8501611-169					
	288	Drawing: Part #71504694					
	289	Extract Cost (Part #715004694) Window nets					
	290	Window net KIT photos					
	291	Safety Review Minutes (Can Am SSV MY19 – 2018-10-23) Storm Max					

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
	292	Safety Review Minutes (Can-Am SSV MY18 – 2016-08-31) Storm					
	293	P1(1) Window net photos					
	294	P1(2) Creations morin/Nascar Door Filler, #715004694 Photos					
	295	P1.5(1) Window net photos					
	296	P1.5(2) Proto Nascar Doors Net Kit #715004694 photos					
	297	P3 Window net photos					
	298	PO 2017-04-10 Window net photos					
	299	PO 2017-05-31 Window net photos					
	300	PO 2017-06-21 Window net photos					
	301	PRE PROD_Installed Window net photos					
	302	Test report (ST-18-9235): Part #715004694 Window net					
	303	Design file re CAD and 3D modeling					
	304	Plaintiff's Answers to BRP Interrogatories (9/28/2020)					
	305	Plaintiff's Response to BRP Request for Production (9/28/2020)					
	306	Plaintiff's Answers to Tidd's Sport Shop First Set of Interrogatories (10/5/2020)					
	307	Plaintiff's Response to Tidd's Sport Shop First Set Request for Production (10/5/2020)					
	308	Plaintiff's First Supplemental Response to BRP Request for Production (11/25/2020)					
	309	Plaintiff's First Supplemental Response to Tidd's Sport Shop First Set Request for Production (11/25/2020)					
	310	Plaintiff's Second Supplemental Response to Tidd's Sport Shop First Set Request for Production (6/22/2021)					
	311	Plaintiff's Third Supplemental Response to BRP Request for Production (7/14/2022)					
	312	Plaintiff's Third Supplemental Response to Tidd's Sport Shop First Set Request for Production (7/14/2022)					

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
	313	Plaintiff's Fourth Supplemental Response to BRP Request for Production (7/26/2022)					
	314	Plaintiff's Fourth Supplemental Response to Tidd's Sport Shop First Set Request for Production (7/26/2022)					
	315	Plaintiff's Fifth Supplemental Response to Tidd's Sport Shop First Set Request for Production (9/13/2024)					
	316	Plaintiff's Fifth Supplemental Response to BRP's Request for Production (9/13/2024)					
	317	Documents Produced by Plaintiff in Plaintiff's Fifth Supplemental Response to BRP's Request for Production and Tidd's Sport Shop's First Request for Production					
	318	Radiology Films Produced by Plaintiff in Plaintiff's Fifth Supplemental Response to BRP's Request for Production and Tidd's Sport Shop's First Request for Production (Withdrawn, Duplicative to Ex. 122 – 128)					
	319	Stephen Ratcliffe Deposition Transcript (4/1/2021)			11/19/24		
	320	Christian Ratcliffe Deposition Transcript and Exhibits (4/28/2021)					
	321	Consolidated Video- Exhibit to Christian Ratcliffe Deposition (4/28/2021) (Duplicative to Ex. 112)					
	322	Cody Trahan Deposition Transcript and Exhibits (10/5/2022) Not to jury			11/21/24	11/21/24	11/21/24
	323	Danny Condon Deposition Transcript (4/26/2021) Not to jury			11/21/24	11/21/24	11/21/24
	324	Jacob Ratcliffe Deposition Transcript (7/1/2021)					
	325	Nathan Leahy Deposition Transcript (6/17/2021)					
	326	Debbie Lynn Flewelling Deposition Transcript and Exhibits (7/13/2021)					
	327	Richard Tidd Deposition Transcript and Exhibits (7/13/2021)					
	328	Sandra Tidd Deposition Transcript and Exhibits (7/15/2021)					
	329	Allen Bernais Deposition Transcript and Exhibits (5/24/2022)					
	330	Bruce Codere Deposition Transcript and Exhibits (4/27/2022)					
	331	Mathieu Hamel-Gagnon (Individual) Deposition Transcript and Exhibits (4/21/2022)					
	332	Mathieu Hamel-Gagnon (30(b)(6)) Deposition Transcript and Exhibits (4/21/2022)					

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
	333	Marc Lacroix Deposition Transcript and Exhibits (6/2/2022)					
	334	Dale Allen Berry, CP, LP, RTP Deposition Transcript and Exhibits (10/10/2022)					
	335	David Lenorovitz, Ph.D. Deposition Transcript and Exhibits (3/22/2023)					
	336	David Schap, Ph.D. Deposition Transcript (10/5/2022)					
	337	Jon A. Mukand, M.D., Ph.D. Deposition Transcript and Exhibits (10/6/2022)			11/18/24		
	338	Robert J. Nibilini, Ph.D. Deposition Transcript (10/12/2022)			11/12/24		
	339	Stephen A. Batzer, Ph.D. Deposition Transcript and Exhibits (10/6/2022) (demonstrative)			11/13/24		
	340	Kevin Breen, P.E. Deposition Transcript (11/2/2022)					
	341	William Newberry, P.E. Deposition Transcript and Exhibits (11/7/2022)			11/22/24		
	342	Steven Hall Deposition Transcript (11/4/2022)					
	343	ESI Preliminary Investigative Report with attachments, dated October 7, 2022					
	344	Curriculum Vitae of Kevin Breen, P.E.					
	345	Expert Report of Stephen Hall, M.S.E., C.P.S.M., dated October 7, 2022					
	346	Curriculum Vitae of Stephen Hall, M.S.E., C.P.S.M.					
	347	Expert Report of William Newberry, P.E., with attachments dated October 7, 2022			11/22/24		
	348	Curriculum Vitae of William Newberry, P.E.					
	349	BEI (Stephen Batzer) Inspection Photographs					
	350	American National Standard for Recreational Off-Highway Vehicles (ANSI/ROHVA 1-2016) Standards					
	351	American National Standard for Product Safety Signs and Labels ANSI Z535.6-2011 (R2017)					
	352	Photo from https://www.cincinnati.com/story/news/2019/10/25/today-history-october-25-1975-evel-knievel-jumped-14-greyhound-buses-kings-island/4057006002/					
	353	Photo from https://www.autoweek.com/car-life/a1882436/cars-featured-james-bond-film-spectre/					

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
	334	Photo from https://www.spokesman.com/stories/2018/jul/08/travis-pastrana-successfully-triplicates-iconic-ju/					
	355	Photo from https://www.motorauthority.com/news/1132032_ken-block-returns-to-rally-racing-in-a-subaru-wrx-sti					
	356	MSF Basic RiderCourse Rider Handbook (2014)					
	357	Fuller, R. (2005). Towards a general theory of driver behaviour. <i>Accident Analysis and Prevention</i> , 37, pp. 461-472					
	358	Hsieh, K.L. & Sosnoff, J.J. (2021). A motor learning approach to reducing fall-related injuries. <i>Journal of Motor Behavior</i> , 53(5), pp. 663-667.					
	359	Iowa Department of Public Safety. (2006, October 5). "Don't Veer for Deer" Safety Campaign Proves Successful in Reduction of Deer/Car Collision Fatalities.					
	360	YouTube video dpgpskqNQm0. https://www.youtube.com/watch?v=dpgpskqNQm0					
	361	Video available for download from https://www.intheknow.com/post/dad-reflexes-ring-camera-collapse/					
	362	Maine DOT. (2015). Maine Collisions Between Vehicles and Large Animals (Demonstrative)			11/21/24		
	363	National Safety Council. (2016). Black ice: a hazard for drivers.					
	364	Learn to Skate USA. (undated). Basic Techniques. < https://www.usfigureskating.org/sites/default/files/media-files/Basic%20Techniques.pdf >					
	365	U-Haul Trailer User Instructions					
663666 336636 766		2019 Kawasaki Brute Force 750 4x4 ATV Owner's Manual					
	367	2019 Yamaha Raptor 700 ATV Owner's Manual					
	368	AEM Safety Manual for Operating and Maintenance Personnel (2016): Rough Terrain Forklift Trucks (368-1 and 368-35) Demonstrative			11/21/24		
	369	Nissan Forklift Platinum Series Operators Manual 1F4 (2012)					
	370	Wright, C. L., & Silberman, K. (2018). Media influence on perception of driving risk and behaviors of adolescents and emerging adults. <i>Transportation Research Part F: Traffic Psychology and Behaviour</i> , 54, 290-298					

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
	371	Tien, A., Chu, P., & Tremblay, L. (2018). Prevalence of risky driving behaviours on popular television series. <i>Canadian Journal of Surgery</i> , 61(5), pp. 355-356					
	372	Vingilis, E., Yildirim-Yenier, Z., Vingilis-Jaremko, L., Seeley, J., Wickens, C. M., Grushka, D. H., & Fleiter, J. (2018). Young male drivers' perceptions of and experiences with YouTube videos of risky driving behaviours. <i>Accident Analysis & Prevention</i> , 120, pp. 46-54.					
	373	Donovan, R.J., Fielder, L., & Ouschan, R. (2010). Do motor vehicle advertisements that promote vehicle performance attributes also promote undesirable driving behaviour? <i>Journal of Public Affairs</i> .					
	374	Shin, P.C., Hallett, D., Chipman, M.L., Tator, C. & Granton, J.T. (2005). Unsafe driving in North American automobile commercials. <i>Journal of Public Health</i> 27(4), pp. 318-325.					
	375	National Highway Traffic Safety Administration. (undated). Using Efficient Steering Techniques. < https://www.nhtsa.gov/sites/nhtsa.gov/files/steeringtechniques.pdf >					
	376	Ayres, Thomas J., Gross, Madeline M., Wood, Christine T., et al., What Is A Warning and When Will It Work?, <i>Proceedings of the Human Factors Society</i> 33 rd Annual Meeting (1989)					
	377	Ayres, Thomas J., Gross, Madeline M., Horst, Donald P., Wood, Christine T., et al., Do Subjective Ratings Predict Warning Effectiveness?, <i>Annual Meeting of the Human Factors Society</i> (1990)					
	378	Boudreau, Patrick, Mackenzie, Susan H., Hodge, Ken, Flow states in adventure recreation: A systematic review and thematic synthesis., <i>Psychology of Sport & Exercise</i> 46 (2020)					
	379	Dorris, Alan L., Product Warnings in Theory and Practice: Some Questions Answered and Some Answers Questioned. <i>Proceedings of the Human Factors Society</i> 35 th Annual Meeting (1991)					
	380	Dowd, John, Risk and the outdoor adventure experience: Good risk, bad risk, real risk, apparent risk, objective risk, subjective risk. <i>Australian Journal of Outdoor Education</i> , Vol. 8 (1), pp. 69-70 (2004)					
	381	Fischer, Peter et al. The Racing-Game Effect: Why Do Video Racing Games Increase Risk-Taking Inclinations? <i>Personality and Social Psychology Bulletin</i> , Vol. 35 No. 10 (October 2009)					
	382	Frantz, J. Paul, Young, Stephen L., Rhoades, Timothy P., Wisniewski, Elaine C., Predicted Versus Actual Response to Warnings, <i>Proceedings of the Human Factors and Ergonomics Society</i> 49 th Annual Meeting (2005)					
	383	Frantz, J. Paul, Young, Stephen L., Shah, Raina J., Rhoades, Timothy P., et al., Predicting the Effects of Task Objectives on Attention to Conspicuous Visual Stimuli: Implications for Industrial Warnings and					

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
		Accident Investigation., Proceedings of the XX Annual International Occupational Ergonomics and Safety Conference (June 2008)					
384		Fuller, Ray, Towards a general theory of driver behaviour. Accident Analysis & Prevention 37 (2005) 461-472					
385		Horst, D.P., McCarthy, G.E., Robinson, J.N., et al., Safety Information Presentation: Factors Influencing the Potential for Changing Behavior. Proceedings of the Human Factors Society 30 th Annual Meeting (1986)					
386		Hsieih, Katherine L., Sosnoff, Jacob J., A Motor Learning Approach to Reducing Fall-Related Injuries. Journal of Motor Behavior 53:5, 663-667 (2021)					
387		Landin, Dennis, The Role of Verbal Cues in Skill Learning, Quest 46:3, pp. 219-313 (2012)					
388		Mollenhauer, Michael A., Dingus, Thomas A., Carney, Cher, et al., Anti-Lock Brake Systems: An Assessment of Training on Driver Effectiveness. Accid. Anal. And Prev., Vol. 29, No. 1, pp/ 97-108 (1997)					
389		Shaver, Eric F., Young, Stephen L., Frantz, J. Paul, Rhoades, Timothy P., Hall, Steven M. and Shah, Raina J., Comparison of ANSI and ISO Standard Formats on People's Response to Product Warnings, Proceedings of the Human Factors and Ergonomics Society 50 th Annual Meeting (2006)					
390		Taylor, Steve, Carr, Anna, Living in the moment: mountain bikers' search for flow, Annals of Leisure Research, DOI: 10.1080/11745398.2021.1974906 (2021)					
391		Vingilis, Evelyn, Yildirim-Yenier, Z., Vingilis-Jaremko, L., Seeley, J., Wickens, Seeley, J., C. M., Grushka, D. H., & Fleiter, J., Literature Review on Risky Driving Videos on YouTube: Unknown Effects and Areas for Concern?, Traffic Injury Prevention. DOI: 10.1080/15389588.2016.1276575					
392		Young, Stephen L., Frantz, J. Paul, Rhoades, Timothy P., Hall, Steven M., Development and Objectives of the ANSI Z535 Series of Standards for Safety Signs and Colors: A Historical Perspective, Handbook of Warnings edited by Michael Wogalter (2006)					
393		2018 Jeep Wrangler JK Owner's Manual					
394		2019 Honda Talon 1000 Owner's Manual					
395		2019 Yamaha Wolverine X2 Owner's Manual					
396		2022 Ford Bronco Owner's Manual					
397		2019 Jeep Owner's Manual					

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
	398	2019 Ford Bronco Owner's Manual (Withdrawn)					
	399	Collection of Side-by-Side Tip over videos 339-AA; 339B; 339M; 339R; 339W (Demonstrative)			11/22/24		
	400	ESI Photographs of Subject Vehicle (Withdrawn, Duplicative to Ex. 3)					
	401	Diagrams of Crash Site (Reserved for rebuttal)					
	402	Photographs of Occupant Retention Testing (Withdrawn, replaced by Ex. 76 and 78)					
	403	Videos of Occupant Retention Testing 403B (Demonstrative)			11/21/24		
	404	Photographs of Vehicle Stability Evaluation (Withdrawn, replaced by Ex. 75 and 80)					
	405	Charts of ANSI/ROHVA Compliance (Demonstrative)			11/20/24		
	406	Charts of Operator's Guide					
	407	Photograph Comparison Vehicle Evaluations (Withdrawn, replaced by Ex. 49)					
	408	Videos of Performance and Function					
	409	ESI Crash Site Evaluation Videos					
	410	ESI Crash Site Evaluation Data Charts (Reserved for rebuttal)					
	411	ESI Crash Site Evaluation Photographs (Withdrawn, duplicative to Ex. 75)					
	412	ESI Crash Analysis Diagrams (Reserved for rebuttal)					
	413	Jeka, John J., Lackner, James R., Fingertip contact influences human postural control., <i>Exp Brain Research</i> , 100:495-502 (1994)					
	414	Zedka, Milan, Kumar, Sharawan, Narayan, Yogesh, Electromyographic response of the trunk muscles to postural perturbation in sitting subjects. <i>Journal of Electromyography and Kinesiology</i> 8: 3-10 (1998)					
	415	Wierville, Walter W., Casali, John G., Repa, Brian S., Driver Steering Reaction Time to Abrupt-Onset Crosswinds, as measured in a Moving-Base Driving Simulator. <i>Human Factors</i> , 25(1), 103-116 (1983)					
	416	Bateni, Hamid, Zecevic, Aleksandra, McIlroy, William E., Maki, Brian E. Resolving conflicts in task demands during balance recovery: does holding an object inhibit compensatory grasping?, <i>Exp Brain Res</i> 157: 49-58 (2004)					

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
	417	Adkin, Allan L., Frank, James S., Carpenter, Mark G., Peysar, Gerhard W., Postural control is scaled to level of postural threat. Gait and Posture 12: 87-93 (2000)					
	418	Swigchem, R. Van, Groen, B.E., Weerdesteijn, V., Duysens, J., The effects of time pressure and experience on the performance of fall techniques during a fall. Journal of Electromyography and Kinesiology 19: 521-531 (2009)					
	419	Lacquaniti, Francesco, Maiolo, Claudio, Anticipatory and reflex coactivation of antagonist muscles in catching. Brain Research 406: 373-378 (1987)					
	420	Forssberg, H., Hirschfield, H., Postural adjustments in sitting humans following external perturbations: muscle activity and kinematics. Exp Brain Res 97: 515-527 (1994)					
	421	CPSC Statement and Public Comment on Impact of ROHVA Standards (Withdrawn, duplicative to Ex. 47)					
	422	Richardson, Rachel E., McMurry, Timothy L., Gepner, Bronislaw, Kerrigan, Jason R., Field Data analysis of recreational off-highway vehicle crashes. Traffic Injury Prevention, Vol. 19, No. 6, 623-628 (2018)					
	423	Injury diagrams, injury photographs, and anatomy graphics illustrating Mr. Ratcliffe's injuries (423-001 and 423-03) Demonstrative			11/22/24		
	423-02	Forearm Extensor Compartment Comparison Photo (Demonstrative)			11/22/24		
	424-1	Post incident photograph of the subject Can-Am annotated (demonstrative)			11/22/24		
	425	ESi post-incident photographs of the subject Can-Am with annotations of scratch pattern (425-1, 425-2, 425-3, 425-4, 425-5) demonstrative			11/22/24		
	426-1	Graphic of scanned subject Can-Am with 3D human model and representative scratch pattern (demonstrative)			11/22/24		
	427	Video related to Exponent's surrogate study with an occupant of stature and weight similar to Mr. Ratcliffe and an exemplar Can-Am (Demonstrative)			11/20/24		
	427-02	Still Photo by William Newberry (Demonstrative)			11/22/24		
	427-06	Still Photo during tests (Duke) Demonstrative			11/22/24		
	428	Graphics/animations depicting the vehicle dynamics and/or kinematics of Mr. Ratcliffe during the subject incident					
	429	Graphic depicting Mr. Ratcliffe's injury mechanics					
	430	Graphic depicting motion of the vehicle with respect to injury pattern					

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
	431	Graphics/animations/photographs/videos related to SAE paper "Biomechanics of Occupant Responses during Recreational Off-Highway Vehicle (ROV) Riding and 90-degree Tip-overs", SAE Int. J. Passenger. Cars - Mech. Syst. 5(1): 2012-01-0096 (431-05; 431-59; 431-60; 431-61; 431-62; 431-63; 431-72) Demonstrative			11/22/24		
	432	Graphics/animations showing sled testing and right-turn dynamics					
	433	Video, photographs, and report related to "Sled Tip-Up Test 2004 Yamaha Rhino 660," TEC11122, April 23-24, 2007 (433-1 demonstrative)			11/22/24		
	434	Graphics illustrating the passive and active response of a belted occupant during tip-over dynamics					
	435	Graphics/animations/photographs/videos related to Exponent Isuzu Rodeo Tip Up Testing (SAE 2005-01-0302)					
	436	Images, graphics and text related to European Community – R&TD-Project – 5th Framework-Programme "Growth" – Improvement of Rollover Safety for Passenger Vehicles, Final Public Report, July 2002 – December 2005					
	437	Still frames from Carr Engineering Intentional UTV tip-up video (demonstrative)			11/22/24		
	438	Demonstrative comparing the findings from the following studies: Improvement of Rollover Safety for Passenger Vehicles, Final Public Report, July 2002 – December 2005; "Electromyographic Activity and Posturing of the Human Neck During Rollover Tests", SAE 2005-01-0302; "Biomechanics of Occupant Responses during Recreational Off-Highway Vehicle (ROV) Riding and 90-degree Tip-overs," SAE Int. J. Passeng. Cars - Mech. Syst. 5(1): 2012-01-0096					
	439	Video, photographs, data, and report related to "Roll Spit Demonstrations 2006 Yamaha Rhino 450," TEC0908286, January 8, 2010 (Demonstrative)			11/22/24		
	440	Graphics/animations/videos prepared in rebuttal to the opinions of Plaintiff's experts (440-04) Demonstrative			11/22/24		
	441	Photographs related to Exponent's surrogate study with an occupant of stature and weight similar to Mr. Ratcliffe and an exemplar Can-Am with a driver side net (441-1, 441-2, 441-3) Demonstrative			11/22/24		
	442	Rollover Test (ST-16-7448)					
	443	Examples of advertising/marketing featuring aggressive driving					
	444	Photographs of Ratcliffe vehicles					

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
	445	Deposition transcript of Daniel Ratcliffe					
	446	ANSI Essential Requirements: Due Process requirements for American National Standards					
	447	BRP Website – Contact Us					
	448	Summary of Field Testing X3 MY17 – 19					
	449	Honda Odyssey photographs (demonstrative)			11/13/24		
	452-194	Photo of Polaris net that was referenced in Camarata case (demonstrative)			11/13/24		
	460	Kim Study (demonstrative)			11/13/24		
	461	Paper by Professor Borrelli (demonstrative)			11/13/24		
	463-1	Photo of Can Am (demonstrative)			11/12/24		
	464	Still from Tidd's Video (demonstrative)			11/19/24		
	468	Photograph of Vehicle with different components labeled (demonstrative)			11/13/24		
	469	2014 Arctic Wildcat Photo (demonstrative)			11/12/24		
	470	Photo 2024 Arctic Cat Wildcat and 2017 Arctic Cat		X	11/13/24	11/13/24	11/13/24
	471	Photo Polaris Ranger and Razor		X	11/13/24	11/13/24	11/13/24
	472	Photo Kawasaki Teryx		X	11/13/24	11/13/24	11/13/24
	474	Commander Photo (demonstrative)			11/20/24		
	475	Images of Jeeps (Demonstrative)		X	11/13/24		
	483	Medical Image of extensor compartment (Demonstrative) Annotation saved			11/13/24		
	489	CDC Life tables (2023)			11/19/24		
	492	Article of Modest Drinking			11/18/24		
	498	Breen (Demonstrative)			11/20/24		
	499	Hall Maverick Operator's Guide Excerpts (Demonstrative)			11/21/24		

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
	500	Hall Images (Demonstrative)			11/21/244		
1		BRP Invoice to Houlton Powersports: April 9, 2019			11/20/24	11/20/24	11/20/24
2		BRP Certificate of Origin for Vehicle (to Tidd's Sport Shop Inc.): April 9, 2019					
3		BRP Side by Side Pre-Delivery Checklist Form (Blank)					
4		Tidd's Purchase Agreement: July 30, 2019			11/12/24	11/12/24	11/12/24
5		Certificate of Temporary ATV Registration					
6		BRP's 2019 Operator's Guide for Can-Am Maverick Series					
7		BRP's Answers to Interrogatories					
8		Allen Bernais BRP Can-Am Off-Road SSV- Doors YouTube Video November 22, 2013 (LINK)					
9		Allen Bernais BRP Can-Am Off-Road SSV- Doors (VIDEO)	X		11/13/24	11/13/24	11/13/24
10		"Take Flight" BRP Can-Am FB Post August 13, 2017, (LINK)	X		11/12/24	11/12/24	11/12/24
11		"Take Flight" Screenshot					
12		"Offroad domination" BRP Can-Am FB Post September 16, 2017 (LINK)	X		11/12/24	11/12/24	11/12/24
13		"Offroad domination" Screenshot					
14		"Wheelie Wednesday" BRP Can-Am FB Post December 5, 2018 (LINK)	X		11/12/24	11/12/24	11/12/24
15		"Wheelie Wednesday" Screenshot					
16		"Half dozen donuts" June 7, 2019, BRP Can-Am FB Post (LINK)	X		11/12/24	11/12/24	11/12/24
17		"Half dozen donuts" Screenshot with call-out					
18		"Sky miles" BRP Can-Am FB Post October 15, 2019 (LINK)	X		11/12/24	11/12/24	11/12/24
19		"Sky miles" Screenshot					
20		"Double donuts" BRP Can-Am FB Post, June 5, 2020 (LINK)	X		11/12/24	11/12/24	11/12/24
21		"Double donuts" Screenshot					

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
22		"Tech Talk Tuesday" BRP Can-Am FB Post, July 21, 2020 (LINK)	X		11/12/24	11/12/24	11/12/24
23		"Tech Talk Tuesday" Screenshot with call-outs (demonstrative)	x		11/13/24		
24		"Slide into Monday" BRP Can-Am FB Post, September 21, 2020 (LINK)	X		11/12/24	11/12/24	11/12/24
25		"Slide into Monday" Screenshot					
26		"Donuts on us/ spin, spin, spin" BRP Can-Am FB Post, June 4, 2021 (LINK)	X		11/12/24	11/12/24	11/12/24
27		"Donuts on us/ spin, spin, spin" Screenshot with call-outs					
28		BRP Copy Deck-Script - Ode to the Defiant Ones	x		11/20/24	11/20/24	11/20/24
29		"Would have to get nuts" Go-Pro Video, Audio Recording at Tidd's					
30		Tidd's Answers to Interrogatories					
31		State of Maine Crash Report					
32		Maine Warden Service Incident Report			11/22/24		
33		Houlton Police Report					
34		Post-accident Go-Pro, Audio Recording					
35		Accident Site Inspection photograph no. 1, June 25, 2019					
36		Accident Site Inspection photograph no. 2, June 25, 2019					
37		Gogan's pit Google satellite image					
38		BRP Rapport D'Incidents					
39		BRP Test de Renveserment (Indoor Rollover Test): June 16, 2016			11/12/24	11/12/24	11/12/24
40		BRP Laboratory Test (Outdoor Rollover Test): June 28, 2016			11/12/24	11/12/24	11/12/24
41		BRP Indoor Dummy Rollover Test Video					
42		BRP Outdoor Dummy Rollover Video (Short Version)	X		11/12/24	11/12/24	11/12/24
43		Short Version Screenshot no. 1					

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
44		Short Version Screenshot no. 2					
45		BRP Outdoor Dummy Rollover Video (Long Version)					
46		BRP Safety Review Meeting Minutes: April 19, 2017			11/12/24	11/12/24	11/12/24
47		BRP Can-Am Maverick and Commander Diagrams (Model Year 2014)					
48		BRP OE Can-Am Maverick Door Nets Diagram: 2013					
49		BRP Front Window Nets Tech Pack			11/12/24	11/12/24	11/12/24
50		BRP Project SHIFT Door Net (NASCAR Style) Screenshot					
51		Creations Morin NASCAR Door Filler (Window Nets) Invoice to BRP: July 14, 2017					
52		BRP Marketing photos no. 1 of Maverick X3 with window nets					
53		BRP Marketing photos no. 2 of Maverick X3 with window nets					
54		BRP Can-Am Maverick X3 Accessories Catalog			11/12/24	11/12/24	11/12/24
54A		Page of Catalog			11/12/24	11/12/24	11/12/24
55		Photo of Can-Am Window Net in-facing side (purchased by Plaintiff's counsel)			11/19/24	11/20/24	11/20/24
56		Photo of Can-Am Window Net out-facing side (purchased by Plaintiff's counsel)					
57		Photo of PRP Window Net (purchased by Plaintiff's counsel)					
58		US Patent Tucker Window Net					
59		US Patent Sanschagrin Lateral Cover					
60		US Patent Spindler Door					
61		US Patent BRP Off Road Vehicle					
62		US Patent LaRoche Door					
63		US Patent Gordon Window Net					
64		BRP Part Test Request SHIFT doors net (NASCAR style): July 4, 2017			11/12/24	11/12/24	11/12/24

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
65		BRP Validation Plan Results					
66		BRP Physical Test Request SHIFT door nets (NASCAR style) table					
67		BRP O-Rings of NASCAR net - Saline Bath+ UV Tests: April 2018 (demonstrative)			11/20/24		
68		2019 Honda Talon Manual			11/12/24		
69		Exemplar Rhino wrist restraints (purchased by Plaintiff's Counsel)					
70		Rhino wrist restraints screenshots					
71		Design Hierarchy Diagram (demonstrative)			11/12/24		
72		Expert Report of Stephen Batzer, Ph.D.					
73		CV of Stephen Batzer, Ph.D.					
74		Stephen Batzer, Ph.D., report images					
74H		Side Nets for Honda SXS (Demonstrative)	X		11/13/24		
74U		Photo of Polaris UTV (demonstrative)			11/12/24		
75		Stephen Batzer, Ph.D., report videos (1-21) Video 5,6,10,19, 20 (demonstrative)			11/12/24		
76		Stephen Batzer, Ph.D., photographs- June 29, 2022 (Page 7, 23)			11/12/24	11/12/24	11/12/24
77		Deposition Transcript of Stephen Batzer, Ph.D.					
78		Expert Report of Robert Nibilini, Ph.D.					
78-81		Tilt Table Photo (demonstrative)					
78-88		Tilt Table Photo (demonstrative)					
79		CV of Robert Nibilini, Ph.D.					
80		Robert Nibilini, Ph.D., report images					
80C		Figure 3 - Still images from consolidated video			11/13/24	11/13/24	11/13/24
80		80B; 80F; 80G; 80J, 80K, 80L; 80M 80N; 80O; 80P, 80Q, 80R, 80S, 80T and 80U (demonstrative)			11/13/24		

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
81		Nobilini report videos (1-30) – Portions viewed 2, 3, 27, 29 and 30 (demonstrative)	X		11/13/24		
81		Nobilini report video - portion 7 (demonstrative)			11/13/24		
81		Nobillini report still photos produced by Defendant 81-11, 81-5, (demonstrative)			11/13/24		
81		Stills from Video (81-7A; 81-26A; 81-21A) Demonstrative			11/22/24		
82		Deposition Transcript of Robert Nobilini, Ph.D.					
83		Expert Report of David Lenorovitz, Ph.D.					
84		CV of David Lenorovitz, Ph.D.					
85		David Lenorovitz, Ph.D., report images					
86		Deposition Transcript of David Lenorovitz, Ph.D.					
87		Expert Report (Prosthetic Life Cost Plan) of Dale Berry, CP (Demonstrative)			11/19/24		
88		CV of Dale Berry, CP					
89B		Dale Berry, CP, report images (Demonstrative)			11/19/24		
89C		Dale Berry, CP, report images (Demonstrative)			11/19/24		
89D		Dale Berry, CP, report images (Demonstrative)			11/19/24		
90		Deposition Transcript of Dale Berry, CP					
91		Expert Report (Economic Analysis of Life Care Plan) of David Schap, Ph.D.					
91A		David Schap Calculation (demonstrative)			11/19/24		
92		CV of David Schap, Ph.D.					
93		Deposition Transcript of David Schap, Ph.D.					
94		Expert Report of Jon Mukand, M.D.			11/18/24		
95		CV of Jon Mukand, M.D.					
96		Jon Mukand, M.D., report images					

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
96F		Jon Mukand, M.D., report Image			11/18/24	11/18/24	11/18/24
96G		Jon Mukand, M.D., report Image			11/18/24	11/18/24	11/18/24
96H		Jon Mukand, M.D., report Image			11/18/24	11/18/24	11/18/24
96I		Jon Mukand, M.D., report Image			11/18/24	11/18/24	11/18/24
96J		Jon Mukand, M.D., report Image			11/18/24	11/18/24	11/18/24
97		Deposition Transcript of Jon Mukand, M.D.					
98		Deposition Transcript of Mathieu Hamel-Gagnon (Rule 30(b)(6))					
99		Exhibits to Mathieu Hamel-Gagnon (Rule 30(b)(6)) Deposition					
100		Deposition Transcript of Mathieu Hamel-Gagnon (Individual Capacity)					
101		Deposition Transcript of Marc Lacroix (Rule 30(b)(6)) Not to jury			11/20/24	11/20/24	11/20/24
102		Exhibits to Lacroix depo					
103		Deposition Transcript of Allen Bernais					
104		Exhibits to Bernais depo					
105		Deposition Transcript of Bruce Codere (Rule 30(b)(6))					
106		Exhibits to Codere depo					
107		Deposition Transcript of Richard Tidd					
108		Exhibits to R. Tidd depo					
109		Deposition Transcript of Sandra Tidd					
110		Exhibits to S. Tidd depo					
111		Deposition Transcript of Debbie L. Flewelling					
112		Deposition Transcript of Stephen Ratcliffe					
113		Deposition Transcript of David Ratcliffe (not to jury)			11/22/24	11/22/24	11/22/24

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
114		Deposition Transcript of Christian Ratcliffe					
115		Exhibits to C. Ratcliffe depo					
116		Deposition Transcript of Nathan Leahy					
117		Deposition Transcript of Jacob Ratcliffe					
118		Houlton EMS			11/18/24	11/18/24	11/18/24
119A and B		Houlton Regional Hospital ER			11/18/24	11/18/24	11/18/24
120		LifeFlight of Maine			11/18/24	11/18/24	11/18/24
121A, B, C		Maine Medical Center			11/18/24	11/18/24	11/18/24
122, B C		Christopher Judson, M.D.			11/18/24	11/18/24	11/18/24
123		Price Chopper Pharmacy			11/18/24	11/18/24	11/18/24
124		Hanger Clinic			11/18/24	11/18/24	11/18/24
125		Medical Center Orthotics & Prosthetics			11/18/24	11/18/24	11/18/24
126		Subramani Seetharama, M.D.			11/18/24	11/18/24	11/18/24
127		Brandy Stepney, APRN			11/18/24	11/18/24	11/18/24
128		Windsted Emergency Department			11/18/24	11/18/24	11/18/24
129		Village Medical, Ian Krouson, PA			11/18/24	11/18/24	11/18/24
130		Comprehensive Pain Management			11/18/24	11/18/24	11/18/24
131		Radiology Images (131-1 and 131-2)			11/18/24	11/18/24	11/18/24
132		Medical Bills (1-17)					
133		Photos of Stephen Ratcliffe					
134		Other Similar Incident Reports					
135		BRP Spreadsheet of X3 Rollovers no.1					

Pla Exh No.	Dft BRP Exh No.	Description	BRP Obj	Pla Obj	Date Mentioned	Date Offered	Date Admitted
136		BRP Spreadsheet of X3 Rollovers no. 2					
137		Can-Am Operator's Guide Safety Video					
138		Maverick X3 Warranty Registration					
139		Sheffield Financial					
140		BRP Service Report: February 29, 2021					
141		BRP Promo Video 2018 X3					
142		BRP Promo Video 2020 X3 (FRENCH)					
143		Already rolled my new Maverick X3" YouTube Video					
144		Deposition video of Mark LaCroix Not to Jury			11/18/24	11/18/24	11/18/24
		Jury Note 1			11/25/24		
		Jury Note 2			11/25/24		